



Loving Kindness Healthcare Systems

155 N. Craig Street • Suite 160 • Pittsburgh, PA 15213
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January 14, 2022

United States District Court
Western District of Pennsylvania
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street
Pittsburgh, PA 15219

Ref: *Secretary v. Loving Kindness Healthcare, et al.*, W.D. Pa. 2:20-cv-01087-RJC
Case ID# 1883623

To Whom It May Concern,

This letter is written in conjunction with the Notice of Garnishment against Scott Taylor and Loving Kindness Healthcare Systems, LLC.

The purpose of this hearing to request exemption for two bank accounts required to meet payroll requirements and to meet Federal Tax Deposit requirements.

We request for an expeditious hearing to be scheduled and held within five days.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Taylor".

Scott Taylor
Director of Business Operations

U.S. Department of Labor

Office of the Regional Solicitor
1835 Market Street
Mailstop SOL/22
Philadelphia, PA 19103-2968
Phone: (215) 861-5121 Fax: (215) 861-5162



Writer's Direct Number: (215) 861-5130
Writer's email: kooi.ryan.m@dol.gov

January 4, 2022

Scott Taylor
Loving Kindness Healthcare Systems, LLC
155 North Craig Street, Suite 160
Pittsburgh, PA 15213

Re: *Secretary v. Loving Kindness Healthcare, et al.*, W.D. Pa. 2:20-cv-01087-RJC
Case ID# 1883623

Dear Mr. Taylor,

Enclosed is a notice of garnishment to you and Loving Kindness Healthcare Systems, LLC. Garnishment Writs have been filed with the various garnishees named in the Notice. Copies of the Writs and Orders of the Court are attached as well.

The Notice contains instructions and a list of possible exemptions that you may claim.

Thank you for your attention to this matter.

Very truly yours,

Oscar L. Hampton III
Regional Solicitor

Ryan M. Kooi
Trial Attorney

Enclosures:

- Notice of Garnishment and Instructions
- List of Exemptions
- Applications for Writs of Continuing Garnishment
- Orders Granting Applications
- Writs of Garnishment
- Instructions to Garnishees, Bank of America and PNC Bank

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARTIN J. WALSH, SECRETARY OF LABOR, UNITED STATES DEPARTMENT OF LABOR,	:	
	:	CIVIL ACTION
Plaintiff,	:	No. 2:20-cv-01087-RJC
v.	:	
LOVING KINDNESS HEALTHCARE SYSTEMS, LLC and SCOTT TAYLOR,	:	
Defendant(s),	:	

NOTICE OF GARNISHMENT AND INSTRUCTIONS

TO: SCOTT TAYLOR
LOVING KINDNESS HEALTHCARE SYSTEMS, LLC

YOU ARE HEREBY NOTIFIED that property in which you have a substantial non-exempt interest is being garnished from the following garnishees:

Bank of America
PNC Bank

by the United States Department of Labor, which has a district court civil judgment against you in Civil Case Number 2:20-cv-01087-RJC, Western District of Pennsylvania, in the amount of \$1,358,603.90—of which \$1,358,603.90 has gone unpaid and is subject to this garnishment—for violations of the Fair Labor Standards Act, (“FLSA”), 29 U.S.C. § 201 et seq.

In addition, you are hereby notified that there are exemptions under the law which may protect some of this property from being taken by the Department of Labor if you can show that the exemptions apply. You may elect to exempt certain property from garnishment or other action or proceeding under the Federal Debt Collection Procedures Act, 28 U.S.C. § 3001 *et seq.*

See 28 U.S.C. § 3014. Attached is a summary of the major exemptions that may apply, including situations in the Commonwealth of Pennsylvania.

If you are one of the above-named Defendant Judgment Debtors, you have a right to ask the Court to return your property to you if you think that you do not owe the money to the Department of Labor that it says you do, or if you think the property the Department of Labor is taking qualifies under one of the exemptions.

If you want a hearing, you must notify the Court within 20 days after you receive this notice. You must make your request in writing and either mail it or deliver it in person to the Clerk of the Court at the following address:

United States District Court
Western District of Pennsylvania
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street
Pittsburgh, PA 15219

You should list Case Number 2:20-cv-01087-RJC along with the name of Judge Robert J. Colville on the outside of the envelope. If you wish, you may use this notice to request a hearing by checking the box below and mailing this notice to the same address.

You must also send a copy of your request to the United Sates Department of Labor at the following address so that the government will know you want a hearing:

Ryan M. Kooi
U.S. Department of Labor
Office of the Regional Solicitor
1835 Market Street, Mailstop SOL/22
Philadelphia, PA 19103-2968
kooi.ryan.m@dol.gov

The hearing will take place within five (5) days after the Clerk of the Court receives your request, if you ask for it to take place that quickly, or as soon after that as possible.

At the hearing, you may explain to the Court why you believe that the property that the Department of Labor has taken is exempt or why you think that you do not owe the money to the Department of Labor.

Furthermore the above-named Garnishees are each required to file an answer to the Writ of Garnishment with the Court. The Garnishee is further required to serve you with a copy of the answer. You may also file a written objection to the answer of the Garnishee within 20 days after receipt of the answer. In your objection to the answer, you may also request a hearing. Your written objection must set forth the grounds for any objection and you shall retain the burden of proving such grounds.

A copy of the objection and request for a hearing shall be filed with the Court, and copies served on Ryan M. Kooi, U.S. Department of Labor, Office of the Regional Solicitor, 1835 Market Street, Mailstop SOL/22, Philadelphia, PA 19103-2968, kooi.ryan.m@dol.gov, and the Garnishee or counsel for the Garnishee.

If you do not request a hearing within 20 days after receipt of the answer of the Garnishee, the Court shall promptly enter an order directing the Garnishee as to the disposition of your non-exempt interest in the property.

If you think you live outside the Federal judicial district in which the court is located, you may request, not later than 20 days after you receive this notice, that this proceeding to take your property be transferred by the court to the Federal judicial district in which you reside. You must make your request in writing, and either mail it or deliver it in person to the Clerk of the Court at the following address:

United States District Court
Western District of Pennsylvania
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street

Pittsburgh, PA 15219

You must also send your request to Ryan M. Kooi, U.S. Department of Labor, Office of the Regional Solicitor, 1835 Market Street, Mailstop SOL/22, Philadelphia, PA 19103-2968, kooi.ryan.m@dol.gov, so the Department of Labor will know you want the proceeding to be transferred.

Be sure to keep a copy of this notice for your records. If you have any questions about your rights or this procedure, you should contact a lawyer, an Office of Public Legal Assistance, or the Clerk of the Court. The Clerk is not permitted to give legal advice, but can refer you to other sources of information.

Respectfully Submitted,

Mailing Address:

U.S. Department of Labor
Office of the Regional Solicitor
1835 Market Street, Mailstop SOL/22
Philadelphia, PA 19103-2968
kooi.ryan.m@dol.gov

(215) 861-5130 (voice)
(215) 861-5162 (fax)

Seema Nanda
Solicitor of Labor

Oscar L. Hampton III
Regional Solicitor
/s/ Ryan M. Kooi
Ryan M. Kooi
Trial Attorney
NJ 02829-2004; PA 94126

January 4, 2022

I request a hearing.

Date: _____

Defendant(s): _____